

# **EXHIBIT 3**

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804  
Judge Dan Aaron

This document relates to: Polster

The County of Cuyahoga v. Purdue  
Pharma L.P., et al.  
Case No. 18-OP-45090

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Videotaped deposition of  
CYNTHIA G. WEISKITTEL

November 13, 2018  
8:59 a.m.

Taken at:  
Climaco, Wilcox, Peca & Garofoli  
55 Public Square, Suite 1950  
Cleveland, Ohio

Renee L. Pellegrino, RPR, CLR

<p style="text-align: right;">Page 50</p> <p>1 A. Specific numbers?</p> <p>2 Q. Yes.</p> <p>3 A. No.</p> <p>4 Q. Do you have an impression as to the</p> <p>5 role of illegal heroin compared to prescription</p> <p>6 drugs that are being dispensed according to a</p> <p>7 prescription to somebody who is actually taking</p> <p>8 them?</p> <p>9 A. Yes. I believe most people start</p> <p>10 out taking prescription drugs, and when they can</p> <p>11 no longer get the drugs, they turn to a street</p> <p>12 drug to get the -- the support that they need.</p> <p>13 Q. And what is that impression based</p> <p>14 on?</p> <p>15 A. My work.</p> <p>16 Q. Is there any analysis, any writing</p> <p>17 anywhere that talks about that sort of</p> <p>18 transition, the concept of a gateway drug being</p> <p>19 seen in your work?</p> <p>20 MR. GALLUCCI: Object to form.</p> <p>21 A. I can't give you anything specific.</p> <p>22 Q. I can tell you that we've had</p> <p>23 produced by the Plaintiff's lawyers for Cuyahoga</p> <p>24 County documents that have your name on them,</p> <p>25 including a handful of documents over the last</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. Is there some reason why there</p> <p>2 wouldn't have been any documents memorializing</p> <p>3 that sort of discussion and analysis?</p> <p>4 A. Our work and scope of our work is</p> <p>5 wide. There are a lot of discussions that we</p> <p>6 have that aren't necessarily memorialized in a</p> <p>7 memo.</p> <p>8 Q. Do you recall when you first started</p> <p>9 having discussions like that with Mr. Cabot or</p> <p>10 Ms. Wagner-Chapman?</p> <p>11 A. Chapman-Wagner.</p> <p>12 Q. Chapman-Wagner.</p> <p>13 MR. GALLUCCI: Object to form.</p> <p>14 A. I would say we've been having that</p> <p>15 discussion for several months.</p> <p>16 Q. Have you asked that any kind of</p> <p>17 analysis be done within your patient</p> <p>18 population -- how do you refer to them? I'm</p> <p>19 sorry. How do you --</p> <p>20 A. We call them families or we call</p> <p>21 them clients.</p> <p>22 Q. Clients. Clients seems to be more</p> <p>23 consistent with how some other parts of the</p> <p>24 overall department have referred to them. Is it</p> <p>25 okay if I refer to them as clients?</p>
<p style="text-align: right;">Page 51</p> <p>1 basically four and a half years that you've</p> <p>2 authored. We really have relatively few</p> <p>3 documents you've ever authored, but from the</p> <p>4 ones that we have, there's no analysis, no</p> <p>5 discussion whatsoever about people transitioning</p> <p>6 from a prescription drug to street drugs like</p> <p>7 heroin. Do you think that you've ever written</p> <p>8 that up in some document in your official</p> <p>9 capacity, an e-mail, a memo, any kind of</p> <p>10 document?</p> <p>11 A. I don't know.</p> <p>12 Q. What about your staff; have you ever</p> <p>13 received any kind of analysis or discussion from</p> <p>14 your staff that talks about this idea of</p> <p>15 transition from a legal prescription to illegal</p> <p>16 street drug use like heroin?</p> <p>17 A. We have certainly engaged in</p> <p>18 conversation about it. I do not know if there's</p> <p>19 a document that exists.</p> <p>20 Q. Who have you talked about that with?</p> <p>21 A. My direct reports.</p> <p>22 Q. Who are those?</p> <p>23 A. Christopher Cabot, Tamara</p> <p>24 Chapman-Wagner would be two specific people that</p> <p>25 I've spoken with about it.</p>	<p style="text-align: right;">Page 53</p> <p>1 A. Yes.</p> <p>2 Q. For your clients, has there been any</p> <p>3 analysis that you've requested or seen done that</p> <p>4 looks at the issue of whether people are</p> <p>5 transitioning from a legal prescription for an</p> <p>6 opioid that is written for them and taken by</p> <p>7 them pursuant to prescription to some sort of</p> <p>8 transition over time to illegal street drugs?</p> <p>9 MR. GALLUCCI: Object to form.</p> <p>10 A. Efforts have been made to document</p> <p>11 that information, but I don't have a report for</p> <p>12 you to look at.</p> <p>13 Q. And so there are individual case</p> <p>14 files, correct, where there might be some notes</p> <p>15 about this?</p> <p>16 A. Yes.</p> <p>17 Q. Has there been any kind of effort to</p> <p>18 look at case files collectively to see how often</p> <p>19 this is going on?</p> <p>20 A. The reality is there are thousands</p> <p>21 of case files, and so we have limited resources.</p> <p>22 Our need is to meet the needs of families. We</p> <p>23 are documenting when we can, but we do not have</p> <p>24 a quantitative report for you.</p> <p>25 Q. So case files are one way that</p>